## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA READING DIVISION

IN RE: : CHAPTER 13

.

JAMES JOSEPH POWERS, JR. : Case No. 19-16971-elf

Debtor :

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

Date of Hearing: March 12, 2020 Time of Hearing: 11:00 a.m.

**Location:** U.S. Bankruptcy Court

The Gateway Building 201 Penn Street, 4<sup>th</sup> Floor

Reading, PA 19601

\*\*\*\*\*\*\*\*\*\*\*\*

## CERTIFICATE OF NO RESPONSE AND REQUEST FOR ENTRY OF ORDER

I, Zachary Zawarski, Esquire, attorney for the above Debtor, do hereby certify that I have received no responsive pleading, and have checked the docket and no responsive pleading has been filed to Debtor's Motion to Avoid Judicial Lien of SYSTEMS & SERVICES

TECHNOLOGIES, INC. I further certify that the same was served together with the Notice of Motion to Avoid Judicial Lien, Response Deadline, and Hearing Date and Proposed Order by first-class mail and/or electronic notification on February 20, 2020 to Systems & Services

Technologies, Inc., its counsel, Weltman, Weinberg & Reis Co., LPA, the Chapter 13 Trustee, and the U.S. Trustee. The deadline for a response was March 5, 2020. Debtor seeks the entry of an order granting the requested relief.

Case 19-16971-elf Doc 24 Filed 03/06/20 Entered 03/06/20 07:50:30 Desc Main Document Page 2 of 2

Respectfully Submitted,

Date: March 6, 2020 By: /s/ Zachary Zawarski

ZACHARY ZAWARSKI, ESQUIRE

3001 Easton Avenue Bethlehem, PA 18017 Phone: (610) 417-6345 Fax: (610) 465-9790

zzawarski@zawarskilaw.com Attorney ID No.: 308348 Attorney for Debtors